

PISANELLI BICE PLLC
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101

James J. Pisanelli, Esq., Bar No. 4027
JJP@pisanellibice.com

Todd L. Bice, Esq., Bar No. 4534
TLB@pisanellibice.com

Debra L. Spinelli, Esq., Bar No. 9695
DLS@pisanellibice.com

Jordan T. Smith, Esq., Bar No. 12097
JTS@pisanellibice.com

PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101
Telephone: 702.214.2100
Facsimile: 702.214.2101

Attorneys for Plaintiff Whittlesea Blue Cab Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WHITTLESEA BLUE CAB COMPANY, a
Nevada Corporation,

Plaintiff,

vs.

RASIER, LLC, a Delaware Limited Liability
Company; UBER TECHNOLOGIES, INC., a
Delaware Corporation; ASSEFAW
SELTENE BAHTA, an individual; MARK
BRAGEN, an individual; KEVIN CARTY, an
individual; ELCIDJOHN BALILO DIZON, an
individual; MICHAEL ELSNER, an
individual; MARCO FALCHI, an individual;
EDWIN FAJARDO, an individual; VARDUI
HAKOBYAN, an individual; JOSEPH
KOLANSKI, an individual; PAULIE
LARAMINE, an individual; GARY
ARTHUR LINK, an individual; LAURINCE
LOVELIFE, an individual; MARSHAL LEE
MACRI, an individual; MICHAEL
MENGISTU, an individual;
ANTHONY MORRIS, an individual; MARIA
NEKLJUDOVA, an individual;
MICHAEL PETERS, an individual; OWEN
POMERANTZ, an individual; EMERLITA
TORRES, an individual; MULUGETA TUNI,
an individual; JOHANNA TRELLES, an
individual; NANCY WONG, an individual;
and DOES I through X, inclusive,

Defendants.

Case No.: 2:14-cv-01993-RFB-PAL

**STIPULATION AND ORDER OF
DISMISSAL WITHOUT PREJUDICE**

PISANELLO BICE PLLC
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101

1 Pursuant to Rule 41 of the Federal Rules of Civil Procedure, the parties hereto stipulate and
2 agree to the dismissal of this action **WITHOUT PREJUDICE**. The parties expressly agree that
3 the dismissal of this action does not trigger the two-dismissal rule as the parties are agreeing that
4 this dismissal is without prejudice notwithstanding the fact that Plaintiff had previously voluntarily
5 dismissed a prior action involving Defendants Uber Technologies, Inc. and Rasier, LLC. The
6 remaining defendants – KEVIN CARTY, ELCIDJOHN BALILO DIZON, MICHAEL ELSNER,
7 MARCO FALCHI, JOSEPH KOLANSKI, PAULIE LARAMINE, MARSHAL LEE MACRI,
8 MICHAEL MENGISTU, ANTHONY MORRIS, MICHAEL PETERS, OWEN POMERANTZ,
9 MULUGETA TUNI, JOHANNA TRELLES and NANCY WONG – have not been served, have

10 ///

11 ///

12 ///

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

not made an appearance and have not been involved in a prior dismissed suit by Plaintiffs and thus Plaintiffs voluntarily dismisses this case **WITHOUT PREJUDICE** against them.

Respectfully submitted by:

PISANELLI BICE PLLC

CAMPBELL & WILLIAMS

/s/ Todd L. Bice

/s/ J. Colby Williams

James J. Pisanelli, Esq., #4027
Todd L. Bice, Esq., #4534
Debra L. Spinelli, Esq. #9695
Jordan T. Smith, Esq., #12097
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

Donald J. Campbell, Esq., #1216
J. Colby Williams, Esq., #5549
700 South 7th Street
Las Vegas, Nevada 89101

*Attorneys for Plaintiff Whittlesea Blue Cab
Company*

Quinn Emanuel Urquhart & Sullivan, LLP
Stephen A. Swedlow
Amit B. Patel
500 W. Madison St., Suite 2450
Chicago, Illinois 60661
Quinn Emanuel Urquhart & Sullivan, LLP
Arthur M. Roberts
50 California St., 22nd Floor
San Francisco, California 94111
Telephone: (415) 875-6600
*Attorneys for Defendants Uber Technologies,
Inc.; Rasier LLC; Laurince Lovelife; Emerlita
Torres; Maria Nekljudova; Gary Arthur Link;
Mark Bragen; Edwin Fajardo; Assefaw
Seltene Bahta and Vardui Hakobyan*

IT IS SO ORDERED:

UNITED STATES DISTRICT COURT JUDGE

DATED:

PISANELLI BICE PLLC
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101